

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Jane Doe)
Plaintiff,)
v.) C.A. No.: 6:21-cv-3416-DCC
Luxor Scientific, LLC and David List)
Defendant(s).)

JOINT MOTION FOR ENTRY OF PROPOSED 502(d) ORDER

COMES NOW Plaintiff Jane Doe and Defendants Luxor Scientific, LLC and David List, by and through their undersigned counsel, and hereby request entry of the attached Proposed Rule 502(d) Order, stating as follows:

The inadvertent or unintentional production of privileged or work-product protected documents, electronically stored information (“ESI”) or other information is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by the Federal Rule of Evidence 502(d).

[SIGNATURES ON THE FOLLOWING PAGE]

Respectfully submitted this 13th day of December 2021.

FOR PLAINTIFF:

s/ Brian P. Murphy

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